

FILED 117

JUN 25 2002

AT 8:30                          M  
WILLIAM T. WALSH  
CLERK

UNITED STATES OF AMERICA

v.

DAVID CHANG,

Defendant.

Crim. No. 99-726  
Hon. Alfred M. Wolin

**NOTICE OF MOTION**

TO: George S. Cannellos, Esq.  
OFFICE OF JAMES B. COMEY, ACTING UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY  
One St. Andrew's Plaza  
New York, New York 10007  
(914) 993-1943  
Attorneys for the United States

Bruce S. Rosen, Esq.  
MCCUSKER, ANSELMI, ROSEN, CARVELLI & WALSH  
127 Main Street  
Chatham, New Jersey 07928  
(973) 635-6300  
Attorneys for Proposed Intervenors

Bradley D. Simon, Esq.  
500 Fifth Avenue  
46<sup>th</sup> Floor  
New York, New York 10110-4699  
(212) 730-8900  
Attorney for Defendant David Chang

PLEASE TAKE NOTICE that on July 1, 2002, at 9 a.m., or as soon thereafter as counsel can be heard, Senator Robert G. Torricelli, by and through his attorneys, Paul, Weiss, Rifkind, Wharton & Garrison, shall move, pursuant to Fed. R. Civ. P. 24(a), before the Honorable Alfred M. Wolin, United States District Court,

District of New Jersey, Martin Luther King, Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, to intervene in the above-captioned proceedings for the limited purpose of opposing the motion of proposed intervenors to unseal the Government's letter to the Court pursuant to United States Sentencing Guidelines Section 5K1.1 on behalf of the defendant, dated May 21, 2002. Pursuant to Local Civil Rule 7.1(e)(1), a proposed order is annexed hereto.

PLEASE TAKE FURTHER NOTICE that in support of the motion movant shall rely on the Memorandum of Law of Senator Robert G. Torricelli in Opposition to the Proposed Intervenors' Motion to Unseal Government's Letter Pursuant to United States Sentencing Guidelines Section 5K1.1.

Dated: New York, New York  
June 25, 2002

PAUL, WEISS, RIFKIND, WHARTON & GARRISON

By: Theodore V. Wells, Jr.  
Theodore V. Wells, Jr. (TW-2830)  
1285 Avenue of the Americas  
New York, New York 10019-6064  
(212) 373-3000

Attorneys for Senator Robert G. Torricelli

CERTIFICATE OF SERVICE

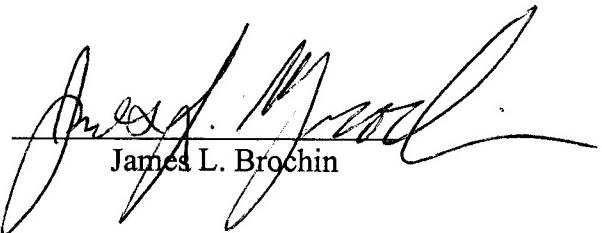
James L. Brochin, hereby declares under penalty of perjury, pursuant to 28 USC Section 1746, that, on June 25, 2002, I caused a true copy of the foregoing document to be served upon the persons listed below by Federal Express.

George S. Cannellos, Esq.  
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Dated: June 25, 2002



James L. Brochin